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COUNSEL TO THE DEBTOR

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

*In re:*

ICED TEA WITH LEMON, LLC,  
  
Debtor.

Chapter 7

Case No. 24-41976-elm7

**MOTION FOR EXTENSION OF TIME FOR FILING  
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

Iced Tea With Lemon, LLC (the “**Debtor**”), hereby moves this Court (the “**Motion**”) for entry of an Order, substantially in the form of Exhibit A attached hereto, pursuant to sections 105(a) and 521 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 1007-1(b) of the Local Rules for the United States Bankruptcy Court for the Northern District of Texas (the “**Local Rules**”), granting the Debtor a thirteen day (13) extension of time for filing its schedules and statement of financial affairs to and including July 3, 2024. In support of the Motion, the Debtor represents the following:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and other predicates for the relief requested herein are Bankruptcy Code sections 105(a) and 521, Bankruptcy Rule 1007(c), and Local Rule 1007-1(b).

### **BACKGROUND**

4. On June 6, 2024, the Debtor filed its petition for relief under Chapter 7 of the Bankruptcy Code. In addition to the above captioned Debtor, six other affiliated entities also filed for relief under Chapter 7 of the Bankruptcy Code.

5. After filing its petition, the Debtor provided operational and other pertinent information to the Chapter 7 Trustee, allowing the Trustee to quickly understand the Debtor's business and operations and thus helping to preserve the value of the Chapter 7 estate.

6. In addition, the Debtor, in compliance with Local Rule 1007-1(b), certifies that it conferred with the Office of the United States Trustee and the Chapter 7 Trustee to determine whether this Motion would be opposed. Both confirmed that the Motion would be unopposed.

### **RELIEF REQUESTED**

7. Pursuant to Bankruptcy Code section 521 and Bankruptcy Rule 1007(c), the Debtor is obligated to file its schedules and statement of financial affairs within fourteen (14) days after filing its petition.

8. By this Motion, the Debtor seeks an extension of thirteen (13) days to file its schedules and statement of financial affairs, or until, and including, July 3, 2024. This additional time will provide the Debtor with an opportunity to thoroughly prepare the schedules and will result in an accurate reporting of the information required to be disclosed therein. Prior to filing, the Debtor ran multiple businesses at multiple locations, and thus, the extra time will benefit all parties by ensuring accuracy for the Debtor and its affiliates. The Debtor is currently compiling

the necessary information to accurately depict its current assets and financial information required to be disclosed in its schedules and to ensure it is complete.

9. This is the Debtor's first request for an extension and, at this time, the Debtor believes that no further extension will be required.

**NOTICE**

10. Notice of this Motion will be provided to: (a) the U.S. Trustee; (b) the Chapter 7 Trustee; and (c) any party that has requested notice pursuant to Bankruptcy Rule 2002.

11. The Debtor respectfully submits that, in light of the relief requested herein, no other or further notice need be given.

**NO PRIOR REQUEST**

12. No previous request for the relief sought herein has been made to this Court or any other court.

*[Remainder of Page Intentionally Left Blank]*

**WHEREFORE**, the Debtor respectfully requests that the Court enter the Proposed Order, substantially in the form attached as Exhibit A, granting the relief requested in this Motion and such other and further relief as may be just and proper.

Dated: June 11, 2024

**POLSINELLI PC**

/s/ Katherine M. Devanney

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COUNSEL TO THE DEBTOR

**CERTIFICATE OF CONFERENCE**

The undersigned counsel certifies that in accordance with the Local Rule of the United States Bankruptcy Court for the Northern District of Texas 1007-1(b), it conferred with the Office of the United States Trustee and the Chapter 7 Trustee and the motion is unopposed.

Dated: June 11, 2024

**POLSINELLI PC**

/s/ Katherine M. Devanney

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COUNSEL TO THE DEBTOR

**Exhibit A**

Proposed Order

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

*In re:*

ICED TEA WITH LEMON, LLC,

Debtor.

Chapter 7

Case No. 24-41976-elm7

**ORDER GRANTING DEBTOR’S MOTION FOR EXTENSION OF TIME FOR FILING  
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

Upon the motion (the “**Motion**”) of the above-captioned debtor (the “**Debtor**”) for entry of an order (the “**Order**”), pursuant to Bankruptcy Code sections 105(a) and 521, Bankruptcy Rule 1007, and Local Rule 1007-1(b), granting the Debtor a thirteen (13) day extension of time for filing its schedules and statement of financial affairs; and this Court having jurisdiction to consider the Motion and the relief requested under 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding under 28 U.S.C. § 157(b)(1); and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of this proceeding

and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtor's notice of the Motion and the opportunity for a hearing on the Motion were adequate and appropriate under the circumstances and no other notice need be provided; and this Court having found good cause for an extension of time; it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The time period within which the Debtor must file its schedules and statement of financial affairs is hereby extended thirteen (13) days until, and including, July 3, 2024.

### End of Order ###

Submitted by:

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COUNSEL TO THE DEBTOR



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 11, 2024, she caused a true and correct copy of the foregoing to be served via ECF on all parties registered to receive ECF notice.

/s/ Katherine M. Devanney  
Katherine M. Devanney